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August 25, 2022

VIA ECF

Re: Catherine Ajaero v. S&P Global Inc. et al
Case No. 21-cv-07894-DLC

Dear Judge Cote:

We represent Defendants S&P Global, Inc. ("S&P Global"), Tamara Vasquez ("Ms. Vasquez") and Shyam Wadhwa ("Mr. Wadhwa") (collectively, "Defendants") in connection with the above-referenced matter. We submit this letter pursuant to Rule 1.E. of Your Honor's Individual Practices in Civil Cases to respectfully request an extension of time for Defendants to file a Motion for Summary Judgment pursuant to Federal Rule of Civil Procedure ("FRCP") 56 from September 30, 2022 up to and including November 2, 2022. The Court has previously granted two extensions of time to complete discovery in this case.

The last deposition in this case is scheduled for August 31, 2022. Pursuant to FRCP 30(e)(1) the witness will then have thirty (30) days to review the transcript and make any requisite changes. Pursuant to FRCP 56, "[u]nless a different time is set by local rule or the court orders otherwise, a party may file a motion for summary judgment at any time until 30 days after the close of all discovery." Under these rules, therefore, Defendants' Motion for Summary Judgment is currently due one week after the final deposition transcript.

To allow the witness time to review her transcript and for Defendants to then prepare the 56.1 statement and accompanying motion papers, Defendants respectfully request an extension of time to file their Motion for Summary Judgment, with the following briefing schedule: 1) Defendants to file their Motion by November 2, 2022; 2) Plaintiff to file her Opposition by December 2, 2022; and 3) Defendants to file their Reply by January 3, 2023. Plaintiff consents to this extension request and briefing schedule.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Diane Windholz
Diane Windholz

4853-9520-5424, v. 1

Granted.
[Signature]
8/25/22